IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

	Columbia	DIVISION	
K.H., by and through her gua litem John D. Elliott, Plaintiff,	rdian ad) Civil Action Number:)) [Richland County C/A#:	3:16-cv-2224-JFA 2016-CP-40-1591
v. South Carolina Department of Services (SCDSS), Anna Jone Johnson, Maya Simone, Socia Jane Roe 1, Social Worker Sug Roe 2, Booker Counts and Lin Defendants.	s, Pheshe l Worker pervisor Jane)) NOTICE OF REMOV) OF DEFENDANTS SO) DEPARTMENT) SERVICES, ANNA) PHESHE JO)))	OUTH CAROLINA OF SOCIAL A JONES, AND

The notice of the Defendants above-named respectfully shows unto this Honorable Court:

- 1. The above-entitled action was brought in the Court of Common Pleas, County of Richland, by the Plaintiff to recover from the Defendants judgment as reflected in the Complaint for allegations of various deprivations of the Plaintiff's Fourteenth Amendment rights pursuant to 42 U.S.C. § 1983. *See*, Complaint; ¶¶ 62 70.
- 2. Upon information and belief, at the time of the commencement of the action and at all times since then, the Plaintiff is a citizen and a resident of the State of South Carolina.
- 3. The Defendants shall pay all costs and disbursements incurred by reason of the removal proceedings should it be determined that the said action was not removable or was improperly removed. Pursuant to United States Code Ann. 28 U.S.C. § 1331, the District Courts have original jurisdiction in all civil actions arising under the Constitution, laws, or treaties of the

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United States. This action alleges federal claims which come within the original jurisdiction of the

United States District Court.

4. Upon information and belief, said action was commenced by the service of a

Summons and Complaint, attached hereto, upon the Defendants on or about May 26, 2016, and that

this Notice of Removal is filed pursuant to 28 U.S.C. § 1446 within thirty (30) days of the receipt by

the Defendants of the initial pleading setting forth the demand upon which relief is claimed.

5. The attorney of record for the Defendants/Petitioners signs this Notice of Removal

pursuant to Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, the Defendants/Petitioners pray that this Court accept this Notice of

Removal which is being filed and that this Honorable Court take jurisdiction of the above-entitled

cause and all further proceedings in said cause in the Court of Common Pleas, County of Richland,

State of South Carolina bearing Civil Action Number 2016-CP-40-1591 be stayed.

DAVIDSON & LINDEMANN, P.A.

s/William H. Davidson, II

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Columbia, South Carolina

June 24, 2016

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